IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CIVIL ACTION
NO.: 02-CV-3600
, 2003, it is hereby
ission pro hac vice of Anna J. Hong,
udwig, J.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATIONAL HEALTHCARE SERVICES, INC.,: CIVIL ACTION

> Plaintiff, NO.: 02-CV-3600

v.

PENN TREATY AMERICAN CORP., et al.

Defendants.

MOTION OF DEFENDANTS FOR ADMISSION PRO HAC VICE OF ANNA J. HONG, ESQUIRE

Defendants Penn Treaty American Corporation, Penn Treaty Network America Insurance Company, and Senior Financial Consultants Company, by their undersigned counsel, hereby move for the admission *pro hac vice* of Anna J. Hong, Esquire, to practice before this Court. In support of this motion, defendants state as follows:

- Ms. Hong is an associate at the law firm of Weil, Gotshal & Manges LLP 1. ("Weil Gotshal"), and her office is located at 767 Fifth Avenue, New York, New York 10153-0119. Her telephone number is (212) 310-8561.
- 2. Ms. Hong is duly qualified to practice in the courts of New York State and the United States District Courts for the Southern and Eastern Districts of New York, among others, and has been a member in good standing of the New York State Bar since 1995.
- 3. There are no disciplinary proceedings pending against her as a member of the Bar in any jurisdiction.

- 4. Weil Gotshal is counsel to defendants Penn Treaty American Corporation and Penn Treaty Network America Insurance Company in another matter, and they, along with co-defendant Senior Financial Consultants Company, have requested Weil Gotshal and Ms. Hong to assist in their representation in this case.
- 5. Ms. Hong is familiar with the factual and procedural history of this litigation. Ms. Hong's admission, pro hac vice, will serve the interests of defendants and will also facilitate the efficient litigation of this matter.
- 6. Ballard Spahr Andrews & Ingersoll, LLP shall continue as attorneys of record for defendants in this matter.
 - 7. This motion is unopposed by plaintiff.
- 8. Attached as Exhibit A and incorporated herein by reference is Ms. Hong's affidavit in support of this motion.

WHEREFORE, defendants respectfully request that the Court grant this motion to admit Anna J. Hong, Esquire, *pro hac vice* to appear in this matter.

> Martin C. Bryce, Jr. Douglas L. Flitter BALLARD SPAHR ANDREWS & INGERSOLL, LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103

Mindy J. Spector, Esq. Anna J. Hong, Esq. WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, NY 10153-0119

Counsel for Defendants, Penn Treaty American Corporation, Penn Treaty Network America Insurance Company and Senior Financial Consultants Company

Dated: June 23, 2003

CERTIFICATE OF SERVICE

I hereby certify that I have today caused true and correct copies of the motion of defendants for the admission pro hac vice of Anna J. Hong, Esquire, to be served on the belowlisted counsel by hand delivery:

> Roberto Rivera-Soto, Esq. Daniel G. Lyons, Esq. Fox Rothschild O'Brien & Frankel LLP 2000 Market Street, 10th Floor Philadelphia, PA 19103

this 23rd day of June, 2003.

Douglas L. Flitter	